



UTAH DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF SOLID AND HAZARDOUS WASTE



COMPLIANCE HISTORY FOR THE
DUGWAY PROVING GROUND

- 1980 Original notification as a small quantity generator
- March 11, 1986, received Notice of Violation (NOV) for failure to submit a biennial report for 1985
- September 11, 1986, received NOV with the following findings:
 - Failure to submit a Part A permit application/request interim status
 - Disposal, storage and treatment of hazardous waste without interim status
 - Failure to comply with interim status storage and treatment requirements
 - Discharging hazardous waste to a surface impoundment
- November 24, 1989, received NOV with the following findings:
 - Storage over 90-days without a permit
 - Open containers of hazardous waste
 - Failure to characterize waste - resulted in improper disposal or management
 - Hazardous waste stored in containers in poor condition
 - Failure to properly label containers
 - Transportation of hazardous waste without a manifest
 - Personnel Training Plans were inadequate
- September 13, 1990, Board approved Consent Order (CO) to resolve 1989 NOV. CO required Dugway to close 41 hazardous waste management units.
- December 24, 1990, received an NOV with the following findings:
 - Storage over 90-days
 - Failure to properly label containers
 - Failure to characterize waste/resulted in improper disposal or management
 - Personnel Training Plan inadequate
 - Storing wastes with codes not included in Part A

Failure to follow and maintain an adequate waste analysis plan
Failure to properly complete manifests
Failure to submit a report required under a variance
Failure to develop and follow an inspection plan
Failure to maintain an adequate contingency plan
Failure to maintain operating records
Accumulating more than 55 gallons of waste at a satellite area

- May 12, 1992, received NOV with the following findings:

Failure to submit a Part A permit application/request interim status
Disposal, storage and treatment of hazardous waste without interim status
Failure to characterize waste/resulted in improper disposal or management
Failure to properly complete manifests
Failure to submit a completed biennial report
Storage over 90-days without plan approval
Failure to properly label containers
Accumulating more than 55 gallons of waste at a satellite area
Storage in open containers
Failure to follow and maintain an adequate waste analysis plan
Failure to develop and follow an inspection plan
Failure to maintain operating records
Failure to install groundwater monitoring systems at HWMUs
Failure to provide liners for waste piles
Disposal of restricted waste in a surface impoundment that does not meet minimum technical requirements
Storage of incompatible waste and failure to inspect 90-day areas
Failure to post signs at hazardous waste management units (HWMUs)
Failure to provide adequate training

- September 17 1993, received NOV with the following findings:

Failure to submit a Part A permit application/request interim status
Disposal, storage and treatment of hazardous waste without interim status
Failure to characterize waste/resulted in improper disposal or management
Failure to properly complete manifests
Storage over 90-days without plan approval
Failure to properly label containers
Failure to develop and follow an inspection plan
Failure to maintain an adequate contingency plan
Failure to maintain operating records
Failure to provide adequate training

Personnel Training Plans inadequate
Failure to post signs at hazardous waste management units (HWMUs)
Failure to submit closure plans
Failure to implement a groundwater monitoring program
Failure to follow an approved closure plan
Failure to report spills
Failure to comply with the land disposal restrictions
Failure to meet minimum requirements for storage of waste in tanks

- March 15, 1994, DSHW issues Dugway a storage permit for a facility called the Central Hazardous Waste Storage Facility.
- September 1994, Board approves Order to resolve September 1993 NOV. Total penalty was \$10,000 cash payment plus a grass reseeding project for areas damaged by wild fires.
- October 1994, Letter of Warning requested modifications to the storage permit. Letter requested Dugway to ask for temporary authorization. Temporary authorization (TA) granted, but permit modifications were not received until March 21, 1996. TA lapsed automatically after 180 days. Personnel training modification has still not been submitted.
- March 7, 1995, received NOV with the following findings:
 - Failure to characterize waste/resulted in improper disposal or management
 - Failure to properly complete manifests
 - Storage over 90-days
 - Failure to properly label containers
 - Failure to develop and follow an inspection plan
 - Failure to maintain an adequate contingency plan
 - Failure to maintain operating records
 - Storage in open containers
 - Hazardous waste stored in containers in poor condition (rusty, leaky)
 - Accumulating more than 55 gallons of waste at a satellite area
 - Failure to post signs at HWMUs
 - Failure to follow and maintain an adequate waste analysis plan
 - Failure to comply with a Consent Order
- September 1995, Board approved a Consent Order to resolve the March 7, 1995 (fall 1994 inspection) NOV. Required Dugway to pay \$54,000.00 and to submit a new QAPP for the lab.

- March 4, 1996, received NOV with the following findings:
 - Failure to characterize waste/resulted in improper disposal or management
 - Storage over 90-days without plan approval
 - Failure to properly label containers
 - Failure to develop and follow an inspection plan
 - Failure to maintain operating records
 - Storage in open containers
 - Failure to follow and maintain an adequate waste analysis plan
 - Accumulating more than 55 gallons of waste at a satellite area
 - Failure to maintain operating records
 - Failure to provide adequate training
 - Failure to comply with a Consent Order
 - Storage of incompatible waste
 - Failure to provide an updated Part A application
 - Failure to submit reports required by an emergency permit
 - Failure to submit an unmanifested waste report

- April 17, 1997, Solid and Hazardous Waste Control Board approved Consent Order to resolve March 4, 1996 (from 1995 inspection) NOV and to resolve findings from an inspection completed in December 1996. An NOV was not issued for the 1996 inspection, but a penalty was collected. Total penalty from NOV and 1996 inspection findings was \$67,252.

- March 9, 1998, received NOV with the following findings:
 - Failure to obtain permits for storing hazardous waste
 - Storage over 90-days
 - Failure to obtain permits for treatment of hazardous waste
 - Speculatively Accumulated hazardous waste, but did not manage as required
 - Failure to modify the facility permit
 - Failure to complete a manifest
 - Failure to make hazardous waste determinations
 - Hazardous waste managed in open containers
 - Hazardous waste managed not in the control of an operator
 - Hazardous waste accumulated in unlabeled containers
 - Failure to include all job descriptions in the training plan
 - Failure to provide adequate training
 - Failure to comply with a Consent Orders
 - Failure to properly label and track universal waste and provide training for managers of universal waste.

- August 7, 1998, the Executive Secretary of the Utah Solid and Hazardous Waste Control Board issues a Research, Demonstration, and Development (RD&D) Permit for Dugway called the Cryofracture Facility.
- May 7, 1999, Utah Solid and Hazardous Waste Control Board approved a Consent Order to resolve the March 9, 1998 (1997 inspection) NOV. Required Dugway to pay \$23,697.00 and submit compliance schedule for the management and clean-up of solid waste management units located near the Carr Facility and connection of a sewer system to Building 3445 at Carr.
- May 14, 1999, the Executive Secretary of the Utah Solid and Hazardous Waste Control Board issues a Research, Demonstration, and Development (RD&D) Permit for Dugway called the Munitions Management Device (MMD-1) Facility.
- September 1, 1999, the Executive Secretary of the Utah Solid and Hazardous Waste Control Board issues a letter to Dugway indicating that no compliance action is necessary to resolve findings of the 1998 Dugway Compliance Evaluation Inspection (CEI).
- September 26, 2000, received NOV with the following findings:
 - Failure to comply to sample treatability study requirements
 - Failure to obtain plan approval for treatment
 - Treating hazardous waste not identified on Part A
 - Failure to ship hazardous waste with correct hazardous waste code
 - Improper management of waste in satellite accumulation areas
 - Failure to comply with interim status waste analysis plan
 - Failure to perform weekly inspections
 - Failure to follow preparedness prevention plan
 - Failure to comply with groundwater requirements
 - Failure to modify hazardous waste permits
 - Failure to provide operating records for inspection
 - Failure to comply with waste analysis plan for the CHWSF
 - Failure to conduct inspections for the MMD
 - Failure to comply corrective action plans
 - Denial of access for inspection
- November 20, 2000, Dugway amends hazardous waste Part B Permit to include an additional hazardous waste storage unit called “Igloo G” (Carr Facility Building 3643).

- August 7, 2001, Dugway terminates the operation of the Research, Demonstration, and Development (RD&D) Permit for Dugway called the Cryofracture Facility. August 8, 2001, Dugway must begin closure activities.
- October 18, 2001, the Executive Secretary of the Utah Solid and Hazardous Waste Control Board proposes a Stipulated Consent Agreement to resolve September 26, 2000, NOV (1999 Inspection) and additional findings for 2000 CEI.

The following findings were alleged for 2000 CEI:

Improper management of hazardous waste in satellite accumulation areas
 Failure to maintain contingency plan equipment
 Failure to inspect
 Failure to comply with training requirements
 Failure to follow waste analysis plan requirements
 Failure to comply with corrective action plans
 Failure to comply with corrective action notification requirements

- November 30, 2001, the Executive Secretary of the Utah Solid and Hazardous Waste Control Board approves closure certification and terminates the Dugway Research, Demonstration, and Development (RD&D) Permit for the Munitions Management Device (MMD-1) Facility.
- November 30, 2001, the Executive Secretary of the Utah Solid and Hazardous Waste Control Board approves Dugway Part B, Module IV, Corrective Action Phase I RCRA Facility Investigation Report for SWMUs identified in Module IV.
- July 31, 2002, received NOV for the 2001 CEI with the following findings:

Failure to obtain plan approval for disposal of hazardous waste
 Failure to submit copies of contingency plan to local authorities
 Failure to amend the contingency plan for interim status unit
 Failure to comply with hazardous waste manifest instructions
 Failure to file a complete biennial report for year 2000
 Failure to make proper emergency response arrangement with local authorities
- October 12, 2002, Utah Solid and Hazardous Waste Control Board approved a Consent Order to resolve the September 26, 2000 (1999 CEI inspection) NOV and 2000 CEI Findings. Required Dugway to pay \$23,305.00.

- December 17, 2003, issued a Warning Letter for the 2003 CEI. The Warning Letter identified uncharacterized waste containers located in the Metal Shop at English Village and in the Vehicle Maintenance Shop at Ditto. Dugway also self reported a 90-day exceedance for IRP waste and a missed inspection at Igloo G. All of the uncharacterized waste issues were corrected immediately.
- December 27, 2004, issued a Warning Letter for the 2004 CEI for missing Chemical Agent Standard Reference Materiel sheets at the Central Chemical Test Facility. Dugway has been working with the Edgewood, Maryland facility to resolve this reoccurring issue. Monitoring issues that were identified and resolved during the EDS Operation at Igloo G were included.